

IN THE COURT OF COMMON PLEAS  
OF ERIE COUNTY, PENNSYLVANIA

LANCE THORNTON,  
Plaintiff

v.

STEVEN DELUCA, JOHN DOE 1, JOHN  
DOE 2, JOHN DOE 3, JOHN DOE 4,  
JOHN DOE 5, JOHN DOE 6, JOHN  
DOE 7, JOHN DOE 8, and JOHN DOE 9,  
JOHN DOE 10, and CITY OF ERIE,  
PENNSYLVANIA  
Defendants

CIVIL DIVISION - LAW

Case No.: 10721-2023

**JURY TRIAL DEMANDED**

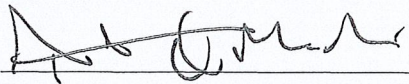
COMMON PLEAS COURT  
ERIE, PA  
2023 APR 20 PM 2:47  
CLERK OF RECORDS  
PROTHONOTARY

**NOTICE OF SERVICE OF PLAINTIFF'S PRE-COMPLAINT DISCOVERY  
REQUESTS DIRECTED TO DEFENDANT STEVEN DELUCA AND  
DEFENDANT CITY OF ERIE, PENNSYLVANIA**

Notice is hereby given that Plaintiff's Pre-Complaint Discovery Requests Directed to Defendant Steven DeLuca and Defendant City of Erie, Pennsylvania was served on the 20th day of April, 2023 by hand delivery to Ed Betza, Esquire City of Erie, Office of City Solicitor, 626 State Street, Erie, PA 16501 and by hand delivery to Steven DeLuca, City of Erie, Bureau of Police, 626 State Street, Erie, PA 16501.

**CERTIFICATE OF COMPLIANCE**

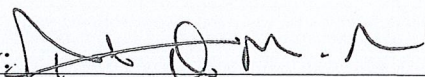
I certify that this filing complies with the provisions of the Case Records Public Access Policy of the Unified Judicial System of Pennsylvania that require filing confidential information and documents differently than non-confidential information and documents.



Timothy D. McNair, Esquire

Respectfully submitted,

MCNAIR LAW OFFICES, PLLC

By: 

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**CERTIFICATE OF SERVICE**

On this 20<sup>th</sup> day of April, 2023 the undersigned does depose and say that he served a true and correct copy of Plaintiff's Pre-Complaint Discovery Requests Directed to Defendant Steven DeLuca and Defendant City of Erie, Pennsylvania by hand delivery upon the following:

Ed Betza, Esquire  
City of Erie, Office of City Solicitor  
City Hall  
626 State Street  
Erie, PA 16501

Steven DeLuca  
City of Erie, Bureau of Police  
City Hall  
626 State Street  
Erie, PA 16501



Timothy D. McNair, Esquire  
Attorney for Lance Thornton, Plaintiff